

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
LEVEL 3 COMMUNICATIONS LLC)	
)	
Petition for Forbearance Under)	
47 U.S.C. §160(c) from Enforcement)	WC Docket No. 03-266
of 47 U.S.C. §251(g), Rule 51.701(b)(1))	
and Rule 69.5(b))	

COMMENTS OF THE
ALABAMA MISSISSIPPI TELECOMMUNICATIONS ASSOCIATION,
CALIFORNIA TELEPHONE ASSOCIATION SMALL COMPANY COMMITTEE,
INDEPENDENT TELEPHONE COMPANIES OF VERMONT,
INDIANA EXCHANGE CARRIER ASSOCIATION,
MICHIGAN EXCHANGE CARRIERS ASSOCIATION,
MISSOURI SMALL TELEPHONE COMPANY GROUP,
MONTANA TELECOMMUNICATIONS ASSOCIATION,
NEW HAMPSHIRE TELEPHONE ASSOCIATION,
OKLAHOMA RURAL TELEPHONE COALITION,
OREGON TELECOMMUNICATIONS ASSOCIATION,
TELEPHONE ASSOCIATION OF MAINE,
TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.,
WASHINGTON INDEPENDENT TELEPHONE ASSOCIATION
AND
THE WISCONSIN STATE TELEPHONE ASSOCIATION

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SUMMARY

These Comments are submitted on behalf of the Rural Companies¹ that operate in a number of states across the nation. These Rural Companies urge the Federal Communications Commission (“Commission”) to deny the Petition filed by Level 3 Communications, LLC (“Level 3”). Based on the description of its service contained in the Level 3 Petition filed in this matter, Level 3 uses the public switched telephone network (“PSTN”) to originate and terminate interexchange calls. Level 3 service uses the PSTN the same way that any other interexchange caller would use the network to originate or terminate interexchange calls.

There is nothing new or immature about the service offered by Level 3 that require special protection. Level 3’s traffic is interexchange traffic under the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the “Act”). Level 3’s service is subject to access charges today and should continue to be subject to access charges. Certainly, the Commission should take no action to change the existing intercarrier compensation mechanism until it does so on a global basis.²

Level 3’s Petition should be denied.

INTRODUCTION

The fact that several state organizations, whether formal or ad hoc, from around the nation have gathered together to submit these Comments underscores the importance of Voice over Internet Protocol (“VoIP”) issues. The Rural Companies view VoIP issues as a real threat to their ability to continue to provide high quality service to the customers in rural America, if

¹ Defined below.

² This is not to be taken to infer the Rural Companies are advocating for a change. As the Commission is well aware, modifications to the existing intercarrier compensation mechanism pose unusually high risks for all rural telephone companies.

VoIP services that use the PSTN are excused from existing intercarrier compensation mechanisms. Allowing one transmission medium to bypass existing intercarrier compensation mechanisms may have a devastating effect on the Rural Companies' ability to continue to provide service.

The state organizations participating in these Comments are set forth below. The member companies of each of the state organizations are listed in Appendix A.

The Alabama Mississippi Telecommunications Association is a voluntary association of rural telephone companies operating in the states of Alabama and Mississippi. These companies provide high quality service to many thousands of rural customers living and working in Mississippi and Alabama.

The California Telephone Association ("CTA") is a statewide non-profit trade association comprised of all of the incumbent local exchange carriers providing telecommunications services within California. The Small Company Committee members are the rural telephone company members of CTA. The purpose of the CTA Small Company Committee is to represent its members on rural company issues.

The Independent Telephone Companies of Vermont is a group of rural telephone companies serving rural areas in Vermont. The companies serve as the voice for Vermont rural customers on telecommunications issues.

The Indiana Exchange Carrier Association ("INECA") is an association of 36 rural telephone companies in Indiana. These cooperative and investor-owned companies provide a broad array of telecommunications services to more than 125,000 local customers.

The Michigan Exchange Carriers Association ("MECA") is an association that preserves, advances and advocates for thirty-three rural local exchange carriers in Michigan in matters of

regulation, interconnection, and carrier relations. The Association seeks to create a favorable business environment that fosters the development of a telecommunications infrastructure necessary for the economic welfare and growth of Michigan.

The Missouri Small Telephone Company Group (“MoSTCG”) is a group of small incumbent local exchange carriers that serve Missouri’s high-cost, low population density rural areas.

The Montana Telecommunications Association (“MTA”) is an association of rural telephone companies, as that term is defined under the Communications Act of 1934 as amended by the Telecommunications Act of 1996 (the “Act”), operating in the state of Montana.

The New Hampshire Telephone Association (“NHTA”) is an association whose members are rural telephone companies serving high cost and rural areas in New Hampshire. NHTA’s members provide state-of-art telecommunications service to approximately 49,000 customers in New Hampshire.

The Oklahoma Rural Telephone Coalition (“ORTC”) represents the interests of rural telephone companies operating within the state of Oklahoma.

The Oregon Telecommunications Association (“OTA”) is the association representing the regulatory and industry concerns of telecommunications companies operating in Oregon. Its members are primarily, although not exclusively, rural telephone companies.

The Telephone Association of Maine (“TAM”) is an association of rural telephone companies serving high cost areas in Maine. The members of TAM provide high quality telecommunications service to their rural customers. TAM is an advocate for the member companies on rural matters.

Texas Statewide Telephone Cooperative, Inc. (“TSTCI”) is a statewide organization representing 19 telephone cooperatives and 16 commercial telephone companies, all incumbent local exchange carriers operating in Texas. TSTCI is dedicated entirely to representing and serving the interests of the Texas rural independent telephone companies and their customers. TSTCI member companies serve the small towns and the vast rural and agricultural areas of Texas. More than 170,000 Texas citizens get their telephone service from TSTCI member companies.

The Washington Independent Telephone Association (“WITA”) is a non-profit association that represents the interests of rural telephone companies providing local telecommunications service within the state of Washington. Its members provide service to nearly 300,000 customers in Washington.

The Wisconsin State Telephone Association (“WSTA”) membership includes incumbent local exchange carriers (“ILEC”) in Wisconsin. The WSTA ILEC membership includes publicly traded, privately held, and cooperative members.

In these Comments, these entities will be referred to collectively as the “Rural Companies.”

LEVEL 3’S PETITION

On December 23, 2003, Level 3 filed a Petition for Forbearance Pursuant to Section 10 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 requesting that the Commission forbear from the application of Section 251(g) of the Act, 47 C.F.R. §51.701(b)(1) and 47 C.F.R. §69.5(b). Specifically, Level 3 asked for forbearance from those provisions to the extent that Level 3’s Internet protocol traffic which originates or

terminates on the PSTN, and what Level 3 describes as incidental PSTN-PSTN traffic, is subject to interstate or intrastate access charges.³ Level 3 requests forbearance not just for itself but for all other carriers handling “Voice-imbedded IP communications that originate or terminate on the PSTN.”⁴ Level 3 describes its Petition as complementary to the Petition filed by AT&T. Petition for Declaratory Ruling that AT&T’s Phone-to-Phone IP Telephony Services Are Exempt from Access Charges, WC Docket No. 02-361 (filed October 18, 2002) (“AT&T Petition”). Level 3 notes that it supports AT&T’s Petition.⁵

Many of the state associations participating in these Comments have filed comments in opposition to AT&T’s Petition. See, e.g., Joint Comments of the Washington Independent Telephone Association, Washington Exchange Carrier Association, Oregon Telecommunications Association, Oregon Exchange Carrier Association, Colorado Telecommunications Association and Montana Telecommunications Association filed December 17, 2002. In addition, TSTCI and MoSTCG each filed comments concerning the AT&T Petition.

Level 3 exempts from its Petition the areas served by rural telephone companies, as defined by the Act. Specifically, Level 3 states at page 8 of its Petition: “Level 3 is not requesting that the Commission forbear from enforcing Section 251(g), Rule 51.701(b)(1), and Rule 69.5(b) with respect to traffic exchanged between Level 3 and a LEC operating within the geographic service area of an ILEC that is currently exempt from Section 251(c) pursuant to Section 251(f)(1). State commissions will then be able to consider this forbearance from weighing the public interest in response to requests to terminate a carrier’s rural exemption.” Level 3 goes on to note that this approach may “slow the offering of new Voice-imbedded IP

³ Level 3 Petition at p. 1 and p. 5-7.

⁴ Level 3 Petition at p. 2.

⁵ Level 3 Petition at footnote 20.

services to consumers in those areas.”⁶ Although not specifying with detail the reasons for this exemption, Level 3 apparently recognizes the limited opportunities for rural telephone companies to replace revenue streams and the need for the rural telephone companies to be fairly compensated for use of their networks as part of the rural telephone companies’ delivery of affordable telecommunications service in the rural and high cost areas of the nation.

LEVEL 3 USES THE PSTN IN THE SAME WAY AS ANY OTHER INTEREXCHANGE CARRIER TO ORIGINATE AND TERMINATE INTEREXCHANGE CALLS

Level 3 clearly recognizes that its service depends upon and utilizes the PSTN. Level 3 describes a call that originates from a customer using telecommunications service on the PSTN to a Level 3 customer as follows:

[T]he calling party initiates the communication on the PSTN by dialing the ten-digit number associated with the IP end-user (e.g., an end-user using Level 3’s (3)Tone service). When the called party’s number is a Level 3 number in the same LATA, that call is carried by the originating caller’s LEC in exchange with Level 3 at a point of interconnection. Level 3 carries the communication over its common carrier transmission facilities to the Level 3 point of presence on the LATA After the communication enters the Level 3 network, the communication undergoes a protocol conversion (i.e., conversion to packets), the ten-digit phone number is translated to an IP address (which can vary according to the end-user’s instructions), and the communication is routed according to the instructions given by the Level 3 end-user to whom the call is directed. The end-user may route the communication to a terminating point within the same local calling area as the call, or to a location in another part of the state, a different state, or a different country.⁷

For a call that originates on Level 3’s IP network and is terminated the PSTN, Level 3 describes the call as follows:

The originating party hands its traffic in IP format to an IP transmission provider (e.g., an Internet Service Provider), which may be a third party, a Level 3 affiliate, or Level 3. The communication is routes over IP networks, and passed among IP networks, until it reaches the Level 3 media gateway closest to the wire center associated with the PSTN number at which the communication is to terminate. At the gateway, the IP-formatted

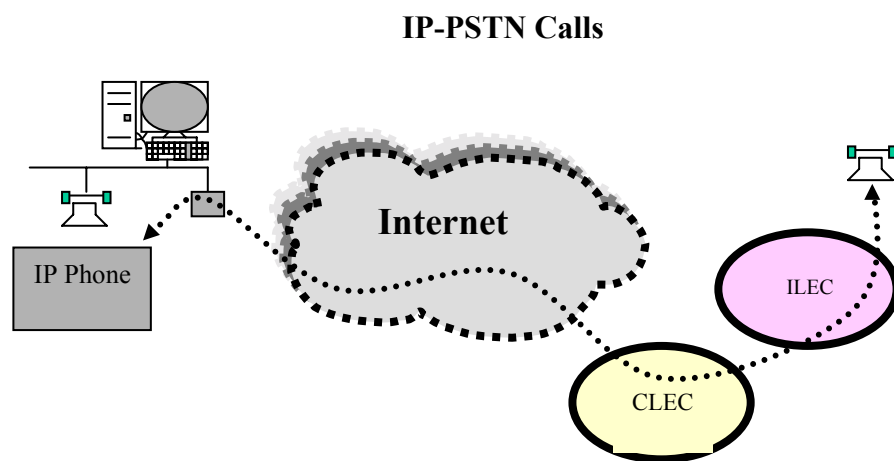
⁶ Level 3 Petition at footnote 21.

⁷ Level 3 Petition at p. 16-17.

communication undergoes a protocol conversion, from IP to circuit-switched. Level 3 then carries the communication over its common carrier facilities to a point of interconnection with the LEC serving the called party.⁸

Thus, Level 3 clearly admits in its Petition that it uses the PSTN to terminate and originate its customer's calls. What is clear is that Level 3 is simply using the Internet and IP as a transmission and routing medium. This transmission medium may be more efficient than fiber optic cable, but fiber optic cable is a transmission medium that is more efficient than copper for backbone network transmission. This efficiency did not make calls that were transmitted over fiber exempt from existing intercarrier compensation mechanisms. Nor should the use of the Internet as a transmission mechanism result in an exception.

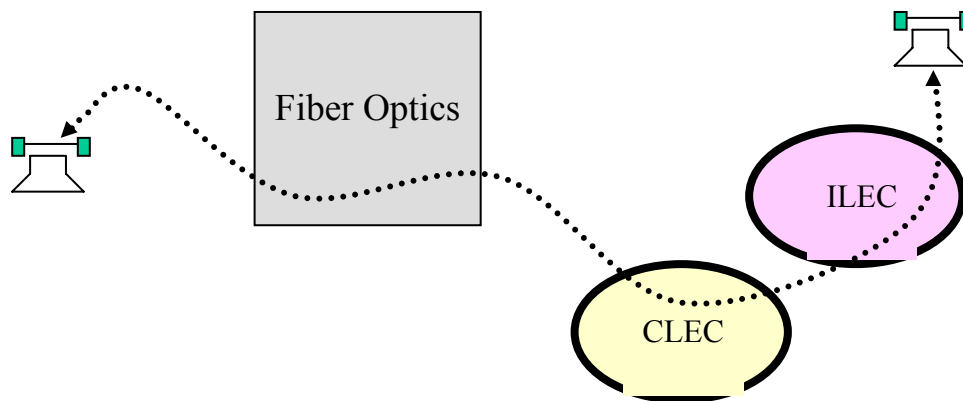
Chart 1 depicts Level 3's use of the Internet as a transmission medium.



⁸ Level 3 Petition at p. 17-18.

Chart 2 shows the flow of traffic using a fiber optic backbone network.

PSTN-PSTN Calls



Other than there being an IP phone at one end of the call, the calls depicted on Charts 1 and 2 look very similar in nature.⁹

To describe this comparison in more detail, an interexchange call that routes from one exchange to a second exchange begins when the calling party dials the appropriate digits which conform to the number of the called party issued under the North American Numbering Plan. That information is then transmitted over the customer's drop to the distribution facilities of the local telephone company, where it is carried by the local telephone company to that company's switch. Then, based upon identification of the customer's pre-subscribed carrier, the call is routed to the appropriate carrier's facilities. Traditionally, that transmission path would either be through a dedicated facility purchased through special access or over a common trunk to which switched access charges apply. The interexchange carrier is responsible for transmission of the call from the point of interconnection with the local company which serves

⁹ In fact, many traditional IXC's have announced they are using or soon will be using Internet transport in their long distance service. For example, in June, 2003 MCI announced plans to move all of its core transport to an Internet based platform by 2005. Press release posted at www.mci.com. Since then, other IXC's have made similar announcements.

the calling party to the call's destination exchange. The interexchange carrier may use a transmission path by microwave, over copper, over fiber optic cable or by satellite. The call is transmitted to the local exchange in which the called party resides and is delivered to the local telephone company serving the called party at the point of interconnection between the local company and the interexchange company. When the traffic is delivered to the meet-point with the terminating local exchange company, the traffic is then routed through that company's switch, out over its distribution plant, through the called party's drop and to the called party's telephone. The interexchange carrier thus uses transmission facilities of both the originating local exchange company and the terminating local exchange company to originate and terminate the call.

This is no different than the transmission path using IP telephony. In PSTN-IP telephony, the call is initiated by the calling party generating the signals associated with the called party's number under the North American Numbering Plan. That call transits the customer's drop to the local telephone company's distribution facilities, where it is carried to the local telephone company's switch. The local telephone company recognizes that call as being routed to a particular carrier over some sort of transmission facility, usually either copper or fiber, to the point at which the interexchange carrier, here using IP telephony, receives the call and assumes the responsibility for transmitting that call to the local exchange carrier on the terminating end of the call.

The point from this discussion is that Level 3, and other IP providers on a "PSTN to IP" call are using the PSTN to originate calls in precisely the same manner as any other interexchange carrier.¹⁰ Level 3 and others depend upon numbers issued in accordance with the

¹⁰ The converse is true for calls terminating to the PSTN on an IP-PSTN call.

North American Numbering Plan to be able to route their call for origination or termination purposes. Level 3 and others make the same use of the LECs' networks, at least on the PSTN side of the call, as any other interexchange carrier. What Level 3 is asking is for an exception that gives it a competitive advantage over other interexchange carriers.

IP-PSTN CALLING DOES NOT NEED PROTECTION TO ENCOURAGE INVESTMENT

Level 3 argues that protection from access charges is needed to encourage investment in IP related products.¹¹ That argument is clearly a red herring. Surely, the Commission is fully aware of press release after press release announcing the roll out of IP based networks from the likes of AT&T, WorldCom, Qwest Communications and others. In addition, Level 3 itself is far from needing investment. In July 2002 Level 3 received a \$500 million cash infusion from three investment firms.¹² Its Form 10-K/A-1 for 2002 states that it has approximately \$1.4 billion in cash and marketable securities.¹³ Obviously, Level 3 has expended millions of dollars in investment in its own IP based network. There is nothing new or immature about using IP technology for transmission of voice calls. When the two largest interexchange carriers, AT&T and MCI, announce that they are moving to an IP based network, that is the very definition of a mature market.

LEVEL 3'S TRAFFIC IS INTEREXCHANGE TRAFFIC UNDER THE ACT

Congress has defined "telecommunications service" as "the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively

¹¹ Level 3 Petition at p. 41 *et. seq.*

¹² *TR Daily*, July 8, 2002, "Warren Buffet Bets on Telecom; Joins \$500M Investment In Level 3.

¹³ Level 3 Communications, Inc., Form 10/K/A-1 to the Securities and Exchange Commission, for fiscal year ended Dec. 31, 2002, page 90.

available directly to the public, regardless of the facilities used.” 47 U.S.C. §153(51) (emphasis added). In turn, the term “telecommunications” is defined as “the transmission, between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information as sent and received.”¹⁴ There is no change in the form or content of the information as sent and received. The person speaking on one end of the call uses his or her voice to transmit the information. The called party on the other end of the call hears that same voice with the same information. An IP-PSTN call is simply a voice call carried through a transmission medium that involves the Internet. It does not involve anything more complicated than that.

NO CHANGE IN COMPENSATION MECHANISMS SHOULD OCCUR UNTIL THE
COMMISSION DETERMINES THE RESULTS OF THE INTERCARRIER
COMPENSATION DOCKET

The transmission of calls that are interexchange in nature, whether PSTN-PSTN or IP-PSTN are currently subject to intrastate and interstate access charges. The Commission should not grant Level 3’s Petition to create an exception for a particular transmission medium. This is particularly true while the Commission is considering changes to intercarrier compensation under the approach of moving to a uniform intercarrier compensation regime in the Intercarrier Compensation NPRM, 16 FCC Rcd. 9610. There is no justification for creating a special exception from the current intercarrier compensation mechanisms while the Commission is undertaking a fundamental review and considering moving to a new mechanism.

All of the major carriers, such as AT&T, WorldCom and others, have made their investments in their IP networks under the current compensation regimen. These carriers must have made that investment knowing that the current regimen calls for the payment of access

¹⁴ 47 U.S.C. §153(48).

charges. To do otherwise would have been to engage in very foolish planning. There is no reason to change the existing intercarrier compensation mechanism on a piecemeal basis.

THE RULING ON PULVER.COM'S PETITION PROVIDES
NO SUPPORT FOR LEVEL 3'S PETITION

Recently, the Commission issued a decision that held that pulver.com's Free World Dialup service is not a telecommunications service and is not subject to intercarrier compensation through the imposition of access charges.¹⁵

Almost at the start of the Commission's opinion in pulver.com, the Commission ruled that it was specifically declining to extend its classification holdings on the legal status of pulver.com's Free World Dialup to the extent pulver.com is involved in any way in communications that originate or terminate on the public switched telephone network, or that may be made via dialup access.¹⁶ The very narrowness of this decision appears to be a recognition that it would not be appropriate to grant broader petitions such as that filed by AT&T or, here, by Level 3.

Given the way in which pulver.com offers its Free World Dialup service, the decision in pulver.com has no bearing on what the Commission should do with the Level 3 Petition. The pulver.com service is a "peer-to-peer" service that requires the use of modems on both ends of the call, makes no use of the PSTN, makes no use of the numbers issued out of the North American Numbering Plan, and at this point is not the service for which a fee is charged.¹⁷ There is absolutely nothing about the Commission's Order in the pulver.com decision that would

¹⁵ In the Matter of Petition for Declaratory Ruling that pulver.com's Free World Dialup is Neither Telecommunications Nor a Telecommunications Service, FCC 04-27, Memorandum Opinion and Order, WC Docket No. 03-45 (Released February 19, 2004).

¹⁶ pulver.com at footnote 3.

¹⁷ See, pulver.com at ¶ 4 and 5.

allow Level 3 to spring off that decision to a conclusion that its services should be exempt from the assessment of access charges.

CONCLUSION

Level 3's Petition for Forbearance should be denied. Level 3 is using IP technology as a transmission mechanism for the routing and transmission of interexchange calls. There is no reason to favor one technology as a routing and transmission mechanism over another technology. The current mechanism for intercarrier compensation is access charges. Those are the rules that apply today. There is no valid reason for making an exception for IP-PSTN calling.

Respectfully submitted this 1st day of March, 2004.

LAW OFFICE OF RICHARD A. FINNIGAN

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Brantley, Wilkerson & Bryan, P.C.
For the Alabama Mississippi Telecommunications
Association

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Brian T. McCartney
Brydon, Swearngen & England P.C.
For the Missouri Small Telephone Company Group

Ron Commingdeer
Commingdeer, Lee & Gooch
For the Oklahoma Rural Telephone Coalition

APPENDIX A

Alabama Mississippi Telecommunications Association

Alabama Members

ALLTELL Alabama, Inc.
Ardmore Telephone Company, Inc.
Blountsville Telephone Company
Butler Telephone Company, Inc.
Brindlee Mountain Telephone Company
CenturyTel of Alabama
Farmers Telephone Cooperative, Inc.
Frontier Communications of Alabama
Frontier Communications of Lamar County
Frontier Communications of the South
GTC, Inc. d/b/a GT Com
Graceba Total Communications, Inc.
GulfTel Communications
Hayneville Telephone Company, Inc.
Hopper Telecommunications Co., Inc.
Interstate Telephone Company
Millry Telephone Company, Inc.
Mon-Cre Telephone Cooperative, Inc.
National Telephone of Alabama, Inc.
New Hope Telephone Cooperative, Inc.
Oakman Telephone Company, Inc.
Otelco Telephone, LLC
Peoples Telephone Company, Inc.
Pine Belt Telephone Company, Inc.
Ragland Telephone Company, Inc.
Roanoke Telephone Company, Inc.
Telephone Electronics Corporation
Union Springs Telephone Company
Valley Telephone Company

Mississippi Members

ALLTEL Mississippi, Inc.
BMP, Inc. d/b/a Noxapater Telephone
Company
Bay Springs Telephone Company
Bruce Telephone Company, Inc.
Calhoun City Telephone Company
CenturyTel of Northern Mississippi, Inc.
Decatur Telephone Company, Inc.
Delta Telephone Company, Inc.
Franklin Telephone Company, Inc.
Frontier Communications of Mississippi
Fulton Telephone Company, Inc.
Georgetown Telephone Company
Lakeside Telephone Company
Mound Bayou Telephone Company
Myrtle Telephone Company
SE Mississippi Telephone Company
Sledge Telephone Company, Inc.
Smithville Telephone Company
Telephone Electronics Corporation

California Telephone Association Small Company Committee

Cal-Ore Telephone Company
Ducor Telephone Company
Evans Telephone Company
Foresthill Telephone Company
Happy Valley Telephone Company
Hornitos Telephone Company
Kerman Telephone Company
Pinnacles Telephone Company
The Ponderosa Telephone Company
Sierra Telephone
The Siskiyou Telephone Company
Winterhaven Telephone Company
Volcano Telephone Company

Independent Telephone Companies of Vermont

Franklin Telephone Company
Ludlow Telephone Company
Northfield Telephone Company
Northland Telephone Company of VT
Perkinsville Telephone Company
Shoreham Telephone Company
Vermont Telephone Company
Waitsfield and Champlain Valley Telephone Company

Indiana Exchange Carrier Association

Bloomington Home Telephone Company, Inc.
Camden Telephone Company, Inc.
Centurytel of Central Indiana, Inc.
Centurytel of Odon, Inc.
Citizens Telephone Corporation
Clay County Rural Telephone Cooperative, Inc.
Communications Corporation of Indiana
Communications Corporation of Southern Indiana
Craigville Telephone Company, Inc.
Daviess-Martin County Rural Telephone Corporation
Frontier Communications of Indiana, Inc.
Frontier Communications of Thorntown, Inc.
Geetingsville Telephone Company, Inc.
Hancock Telecom
Home Telephone Company, Inc.
Home Telephone Company of Pittsboro
Ligonier Telephone Company, Inc.
Merchants & Farmers Telephone Company
Monon Telephone Company, Inc.
Mulberry Cooperative Telephone Company, Inc.
New Lisbon Telephone Company, Inc.
New Paris Telephone, Inc.
Northwestern Indiana Telephone Company, Inc.
Perry-Spencer Rural Telephone Cooperative
Pulaski-White Rural Telephone Cooperative, Inc.
Rochester Telephone Company, Inc.
S & W Telephone Company, Inc.
Southeastern Indiana Rural Telephone Cooperative
Sunman Telecommunications Corporation
Swayzee Telephone Company, Inc.
Sweetser Telephone Company, Inc.
Tipton Telephone Company, Inc.
Tri-County Telephone Company, Inc.
Washington County Rural Telephone Cooperative
West Point Telephone Company, Inc.
Yeoman Telephone Company, Inc.

Michigan Exchange Carriers Association

Ace Telephone Company
Allendale Communications
Baraga Telephone Company
Barry County Telephone Company
Blanchard Telephone Association
Bloomingdale Telephone Company
Carr Telephone Company
CenturyTel of Michigan
CenturyTel of Midwest
CenturyTel of Northern Michigan
CenturyTel of Upper Michigan
Chapin Telephone Company
Chatham Telephone Company
Chippewa County Telephone Company
Communications Corporation of Michigan
Deerfield Farmers' Telephone Company
Drenthe Telephone Company
Hiawatha Telephone Company
Kaleva Telephone Company
Island Telephone Company
Lennon Telephone Company
Midway Telephone Company
Ogden Telephone Company
Ontonagon County Telephone Company
Pigeon Telephone Company
Sand Creek Telephone Company
Shiawassee Telephone Company
Springport Telephone Company
Upper Peninsula Telephone Company
Waldron Telephone Company
Westphalia Telephone Company
Winn Telephone Company
Wolverine Telephone Company

Missouri Small Telephone Company Group

BPS Telephone Company
Cass County Telehone
Citizens Telephone Company
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Fidelity Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
Mark Twain Rural Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company, Inc.
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

Montana Telecommunications Association

3 Rivers Communications
Blackfoot Telephone Cooperative, Inc.
CenturyTel of Montana, Inc.
Citizens Telecommunications Company of Montana
Hot Springs Telephone Company
Lincoln Telephone Company
Range Telephone Cooperative, Inc.
Southern Montana Telephone Company

New Hampshire Telephone Association

Bretton Woods Telephone Company
Dixville Telephone Company
Dunbarton Telephone Company
Granite State Telephone Company
Kearsarge Telephone Company
Merrimack Telephone Company
Northland Telephone Co. of NH
Wilton Telephone Company
Hollis Telephone Company

Oklahoma Rural Telephone Coalition

Atlas Telephone Company
Beggs Telephone Company
Bixby Telephone Company
Canadian Valley Telephone Company
Carnegie Telephone Company
Central Oklahoma Telephone Company
Cherokee Telephone Company
Chickasaw Telephone Company
Choteau Telephone Company
Cimarron Telephone Company
Cross Telephone Company
Dobson Telephone Company
Grand Telephone Company, Inc.
Hinton Telephone Company, Inc.
KanOkla Telephone Association, Inc.
McLoud Telephone Company
Medicine Park Telephone Company, Inc.
Oklahoma Telephone & Telegraph, Inc.
Oklahoma Western Telephone Company
Panhandle Telephone Cooperative, Inc.
Pine Telephone Company, Inc.
Pinnacle Communications
Pioneer Telephone Cooperative, Inc.
Pottawatomie Telephone Company
Salina-Spavinaw Telephone Company, Inc.
Santa Rosa Telephone Cooperative, Inc.
Shidler Telephone Company
South Central Telephone Cooperative, Inc.
Southwest Oklahoma Telephone Company
Terral Telephone Company
Totah Telephone Company
Valliant Telephone Company

Oregon Telecommunications Association – Participating Companies

Asotin Telephone Company d/b/a TDS Telecom
Beaver Creek Cooperative Telephone Company
Canby Telephone Association
Cascade Utilities, Inc.
CenturyTel of Oregon, Inc. and CenturyTel of Eastern Oregon, Inc.
Citizens Telecommunications of Oregon d/b/a Frontier Communications of Oregon
Clear Creek Mutual Telephone Company
Colton Telephone Company
Eagle Telephone System, Inc.
Gervais Telephone Company
Helix Telephone Company
Home Telephone Company
Molalla Communications, Inc.
Monitor Cooperative Telephone Company
Monroe Telephone Company
Mt. Angel Telephone Company
Nehalem Telecommunications, Inc.
North-State Telephone Co.
Oregon-Idaho Utilities, Inc.
Oregon Telephone Corporation
People's Telephone Co.
Pine Telephone System, Inc.
Pioneer Telephone Cooperative
Roome Telecommunications Inc.
St. Paul Cooperative Telephone Association
Scio Mutual Telephone Association
Stayton Cooperative Telephone Company
Trans-Cascades Telephone Company

Telephone Association Of Maine

China Telephone Company
Cobbosseecontee Telephone & Telegraph Company
Community Service Telephone Company
Hampden Telephone Company
Hartland/St. Albans Telephone Company
The Island Telephone Company
Lincolntonville Telephone Company
Maine Telephone Company
Mid-Maine Communications
Northland Telephone Company
Oxford Telephone Company
Oxford West Telephone Company
Pine Tree Telephone & Telegraph Company
Saco River Telegraph & Telephone Company
Sidney Telephone Company
Somerset Telephone Company
Standish Telephone Company
Tidewater Telecom
Union River Telephone Company
Unitel, Inc.
Warren Telephone Company
West Penobscot Telephone Company

Texas Statewide Telephone Cooperative, Inc.

Brazos Telecommunications, Inc.
Brazos Telephone Coop., Inc.
Cameron Telephone Company
Cap Rock Telephone Coop., Inc.
Central Texas Telephone Coop., Inc.
Coleman County Telephone Coop., Inc.
Colorado Valley Telephone Coop., Inc.
Comanche County Telephone Company, Inc.
Community Telephone Company, Inc.
Cumby Telephone Coop., Inc.
Dell Telephone Coop., Inc.
E.N.M.R. Plateau Communications, Inc.
Eastex Telephone Coop., Inc.
Electra Telephone Company
Etex Telephone Coop., Inc.
Five Area Telephone Coop., Inc.
Ganado Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company
Livingston Telephone Company
Mid-Plains Rural Telephone Coop., Inc.
Nortex Communications, Inc.
North Texas Telephone Company
Panhandle Telephone Coop., Inc.
Peoples Telephone Coop., Inc.
Riviera Telephone Company, Inc.
Santa Rosa Telephone Coop., Inc.
South Plains Telephone Coop., Inc.
Tatum Telephone Company
Taylor Telephone Coop., Inc.
Wes-Tex Telephone Coop., Inc.
West Plains Telecommunications, Inc.
West Texas Rural Tel. Coop., Inc.
XIT Rural Telephone Coop., Inc.

Washington Independent Telephone Association

Asotin Telephone Company
CenturyTel of Cowiche, Inc.
CenturyTel of Inter Island, Inc.
CenturyTel of Washington, Inc.
Ellensburg Telephone Company
Hat Island Telephone Company
Hood Canal Telephone Co., Inc.
Inland Telephone Company
Kalama Telephone Company
Lewis River Telephone Company, Inc.
Mashell Telecom, Inc.
McDaniel Telephone Co.
Pend Oreille Telephone Company
Pioneer Telephone Company
St. John Co-operative Telephone and Telegraph Company
Tenino Telephone Company
The Toledo Telephone Co., Inc.
Western Wahkiakum County Telephone Company
Whidbey Telephone Company
YCOM Networks, Inc.

Wisconsin State Telephone Association

Amery Telephone Company	Midway Telephone
Amherst Telephone Company	Milltown Mutual Telephone Company
B.B. & W.	Mosinee Telephone Company
Badger Telephone	Mount Horeb Telephone Company
Baldwin Telecom, Inc.	Mt. Vernon Telephone
Bayland Telephone, Inc.	Nelson Telephone Cooperative
Belmont Telephone Company	Niagara Telephone Company
Bergen Telephone Company	Northeast Telephone Company
Black Earth Telephone	Price County Telephone Company
Bloomer Telephone Company	Richland-Grant Telephone Cooperative, Inc.
Bonduel Telephone	Riverside
Bruce Telephone Company	S & S Telephone
Central State	Scandinavia Telephone
CenturyTel	Sharon Telephone Company
Chequamegon Communications Cooperative, Inc.	Siren Telephone Company, Inc.
Chibardun Telephone Cooperative, Inc.	Somerset Telephone Company
Citizens Telephone Cooperative, Inc.	Southeast Telephone
Clear Lake Telephone Company	Spring Valley Telephone Company, Inc.
Cochrane Cooperative Telephone Company	State Long Distance Telephone Company
Coon Valley Farmers Telephone Company, Inc.	Tenney Telephone
Cuba City Telephone Exchange Company, Inc.	Tri-County Telephone Cooperative, Inc.
Dickeyville Telephone	Union Telephone Company
East Coast	Utelco
Farmers Independent Telephone Company	Verizon North, Inc.
Farmers Telephone	Vernon Telephone Cooperative Inc.
Frontier Communications of Wisconsin, Inc.	Waunakee Telephone
Grantland Telephone	West Wisconsin Telcom Cooperative, Inc.
Hager Telecom, Inc.	Wittenberg Telephone Company
Hillsboro Telephone Company, Inc.	Wood County
Indianhead Telephone Company	
Lakefield Telephone Company	
La Valle Telephone Cooperative	
Lemonweir Valley Telephone Company	
Luck Telephone Company	
Manawa Telephone Company, Inc.	
Marquette-Adams Telephone Cooperative, LLC	
Mid-Plains Telephone	